

THE HONORABLE JOHN C. COUGHENOUR

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE VALVE ANTITRUST  
LITIGATION

CIVIL ACTION No. 2:21-cv-00563-JCC

**DECLARATION OF BENJAMIN  
GREENBERG IN SUPPORT OF  
MOTION TO KEEP NON-PARTY  
BEST BUY'S HIGHLY  
CONFIDENTIAL – ATTORNEY'S  
EYES-ONLY INFORMATION  
UNDER SEAL**

I, Benjamin Greenberg, declare the following:

1. I am a Partner at the law firm Dorsey & Whitney LLP and counsel to Best Buy Co., Inc. (“Best Buy”). The facts stated in this declaration are based on my own personal knowledge, and if called as a witness, I could and would testify to those facts.

2. I submit this declaration in support of Best Buy’s motion to seal in the above-captioned litigation.

3. I attest that the highlighted portions of the opening expert report of Dr. Steven Schwartz, (Exhibit 1 to the Declaration of Alicia Cobb) (Dkt. # 182-1 – under seal) (“Schwartz Report”) in support of Plaintiffs’ motion for class certification that is appended to the Declaration of Ashley Pierson in Support of Motion to Keep Non-Party Best Buy’s Highly Confidential – Attorney’s Eyes-Only Information Under Seal, contains information from documents that Best

1 Buy designated and produced as “Highly Confidential – Attorney’s Eyes-Only” during discovery.

2 4. I also attest that I telephonically met and conferred with Plaintiffs’ counsel to  
3 discuss the sealing of the above-referenced information on March 27, 2024. I also conferred via  
4 videoconference with Valve’s counsel on the same day.

5 5. Plaintiffs and Valve do not oppose Best Buy’s present motion to Keep Non-Party  
6 Best Buy’s Highly Confidential – Attorney’s Eyes Only Information Under Seal.

7 I declare under penalty of perjury that the foregoing is true and correct.

8  
9 DATED this 20<sup>th</sup> day of June, 2024, at Seattle, Washington.

10  
11 /s/ Benjamin Greenberg  
12 Benjamin Greenberg  
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**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that on June 20, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated this 20<sup>th</sup> day of June, 2024.

/s/ Hannah Richter  
Hannah Richter, Legal Assistant